



SENT VIA CM/ECF

January 14, 2025

Hon. Brenda K. Sannes  
Chief Judge  
United States District Court for the Northern District of New York  
Federal Building and US Courthouse  
P.O. Box 7336  
Syracuse, New York 13261-8593

**Sarhadi v. Geever, et al., Civil Action No. 24-cv-00031 (BKS/CFH)**

Dear Judge Sannes:

McAllister Olivarius represents the Plaintiff, Kristina Sarhadi, in the above referenced matter. Pursuant to Local Rule 7.1(j), Plaintiff submits this motion for extension of time to file her motion for default judgment as to Defendant Justin Geever a/k/a Justin Sane (“Geever”).

On December 18, 2024, the Court issued an order instructing Plaintiff to file her motion for default judgment as to Geever, pursuant to Rule 55(b) and Local Rule 55.2, within 30 days. ECF No. 40.

Plaintiff has faced some delay in collecting information pertinent to her motion for default judgment because of the Christmas and New Year holidays. As such, Plaintiff seeks a brief extension of time to submit her motion for default judgment.

Plaintiff’s timely motion for extension of time is made in good faith and not for an improper purpose or to unduly delay the litigation of these proceedings. Plaintiff has not previously sought the relief requested in the instant motion.

McALLISTER  
OLIVARIUS

Plaintiff respectfully requests that the Court grant her motion for extension of time to file her motion for default judgment to January 31, 2025 and for any other relief this Honorable Court deems just and proper.

Respectfully submitted,



Dr. John McAllister  
*Counsel for Plaintiff*

cc: Counsel of Record [Via CM/ECF]